



State of Utah

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Department of
Environmental Quality

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DIVISION OF WATER QUALITY
Walter L. Baker, P.E.
Director

Incoming ✓
C0070012

JUL 02 2014

Steve Christensen, Permit Supervisor
Division of Oil, Gas and Mining
1594 West North Temple, Suite 1210
P.O. Box 145801
Salt lake City, UT 84114-5801

Dear Mr. Christensen:

Subject: Use of Material from Coarse Refuse Pile at the Price River Terminal, LLC
Wellington Prep Plant; UPDES Permit UTG040010

We have reviewed your letter of May 13, 2014 and the associated report and have concerns regarding the concentration of several metals in the coarse refuse pile material that dramatically exceed surface and ground water quality standards. In addition, when utilizing the proposed potential leachate concentrations, for screening purposes, by reducing the concentrations by a factor of 20, as suggested in the consultant's investigative report, the resulting potential leachate concentrations for several of the metals tested still exceed the water quality standards.

At this time the material is contained, apparently stable, and disposal of these materials can be addressed properly by DOGM regulations. If the material is removed from its present location and used as base/fill for railroad track expansion, we are concerned of the potential for ground and surface water contamination due to the project's proximity to the Price River. The potential for contamination is increased due to the removal and transport of material from where it is currently contained and permitted under the General Coal Permit (a point source permit, also covered by DOGM reclamation requirements) to areas where it is not contained and with a high potential for release into the environment. We do not recommend the movement of heavy metal laden material from a controlled point source location to uncontrolled non-point source areas and do not support the use of this material as base/fill material for railroad construction.

If you or anyone else have any questions please contact Mike Herkimer of my staff at 801-536-4386 or mherkimer@utah.gov.

Sincerely,



Walter Baker, P.E.,
Director

WLB:MDH:pe

cc: Brady Bradford, Southeastern Utah District Health Department
David Ariotti, District Engineer

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